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*Of Attorneys for Defendants
Marc Baier, Ryan Adams, and Daniel Gericke*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

**LOUJAIN HATHLOUL
ALHATHLOUL,**

Plaintiff,

vs.

**DARKMATTER GROUP, MARC
BAIER, RYAN ADAMS, AND DANIEL
GERICKE,**

Defendants.

No. 3:21-cv-01787-IM

**JOINT UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS DARKMATTER GROUP,
MARC BAIER, RYAN ADAMS, AND
DANIEL GERICKE TO ANSWER AND/OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel certify that counsel for Defendant DarkMatter and counsel for the Individual Defendants have conferred with Plaintiff's counsel, and Plaintiff does not oppose this motion.

JOINT MOTION

Defendants DarkMatter Group ("DarkMatter"), Marc Baier, Ryan Adams, and Daniel Gericke, ("Individual Defendants," and collectively, "Defendants") by and through their undersigned counsel, hereby submit this Joint Unopposed Motion for Extension of Time to Answer and/or Otherwise Respond to Plaintiff's Complaint. Defendants seek an extension up to and including May 30, 2022, to answer and/or otherwise respond to Plaintiff's Complaint.

Plaintiff Loujain Hathloul Alhathloul has filed Affidavits of Service indicating that Defendant DarkMatter Group and each of the Individual Defendants (Marc Baier, Ryan Adams, and Daniel Gericke) each waived service of Plaintiff's Complaint on February 28, 2022. According to the Waivers of the Service of Summons, each Defendant must serve an answer or a motion under Rule 12 within 60 days from February 28, 2022, which would make Defendants' responses to the Complaint due April 29, 2022.

Defendants each request an extension up to and including May 30, 2022, to answer and/or otherwise respond to Plaintiff's Complaint. Plaintiff has consented to this request.

WHEREFORE Defendants hereby respectfully request that this honorable Court grant this unopposed motion to extend the time up to and including May 30, 2022, for Defendants DarkMatter, Marc Baier, Ryan Adams, and Daniel Gericke to answer and/or otherwise respond to Plaintiff's Complaint.

Dated this 10th day of March, 2022.

Respectfully submitted,

SNELL & WILMER L.L.P.

SCHWABE, WILLIAMSON & WYATT, P.C.

s/ Clifford S. Davidson (by permission)

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s/ Nika Aldrich

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